

KOH/KNO: USAO 2017R0200

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

KYLE STEPHEN THOMPSON,

Defendant

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CRIMINAL NO.

(Production of Child Pornography,
18 U.S.C. § 2251(a); Forfeiture,
18 U.S.C. § 2253, 28 U.S.C. § 2461(c))

TDC 17cr195

INDICTMENT

COUNT ONE

(Production of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about May 9, 2015, in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT TWO
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about May 19, 2015, in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 2, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT THREE
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about September 27, 2015, at approximately 7:02 p.m., in the District of Maryland,
the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to
engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2),
for the purpose of producing a visual depiction of such conduct, and the visual depiction was
produced using materials that had been mailed, shipped, and transported in and affecting
interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT FOUR
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about September 27, 2015, at approximately 8:51 p.m., in the District of Maryland,
the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to
engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2),
for the purpose of producing a visual depiction of such conduct, and the visual depiction was
produced using materials that had been mailed, shipped, and transported in and affecting
interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT FIVE
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about February 27, 2016, in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 3, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT SIX
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about March 4, 2016, at approximately 6:23 p.m., in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT SEVEN
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about March 4, 2016, at approximately 7:22 p.m., in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT EIGHT
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about March 4, 2016, at approximately 7:40 p.m., in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT NINE
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about March 4, 2016, at approximately 7:49 p.m., in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT TEN
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about March 4, 2016, at approximately 10:51 p.m., in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT ELEVEN
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about March 5, 2016, at approximately 8:23 a.m., in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT TWELVE
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about March 5, 2016, at approximately 8:27 a.m., in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT THIRTEEN
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about October 8, 2016, in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT FOURTEEN
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about January 13, 2017, in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT FIFTEEN
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about January 27, 2017, in the District of Maryland, the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT SIXTEEN
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about January 28, 2017, at approximately 6:26 a.m., in the District of Maryland,
the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to
engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2),
for the purpose of producing a visual depiction of such conduct, and the visual depiction was
produced using materials that had been mailed, shipped, and transported in and affecting
interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT SEVENTEEN
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about January 28, 2017, at approximately 6:44 a.m., in the District of Maryland,
the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to
engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2),
for the purpose of producing a visual depiction of such conduct, and the visual depiction was
produced using materials that had been mailed, shipped, and transported in and affecting
interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT EIGHTEEN
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about January 28, 2017, at approximately 10:17 a.m., in the District of Maryland,
the defendant,

KYLE STEPHEN THOMPSON,

knowingly employed, used, persuaded, induced, enticed, and coerced a minor, Victim 1, to
engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2),
for the purpose of producing a visual depiction of such conduct, and the visual depiction was
produced using materials that had been mailed, shipped, and transported in and affecting
interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Title 18, United States Code, Section 2253, and Title 28, United States Code, Section 2461(c), upon conviction of the offenses set forth in Counts One through Eighteen of this Indictment, in violation of Title 18, United States Code, Section 2251(a), the defendant,

KYLE STEPHEN THOMPSON,

shall forfeit to the United States of America:

a. Any visual depiction described in Title 18, United States Code, Section 2251, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

2. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided
without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title
21, United States Code, Section 853(p), as incorporated in Title 18, United States Code, Section
2253(b).

18 U.S.C. § 2253
28 U.S.C. § 2461(c)

Rod J. Rosenstein / KOH
ROD J. ROSENSTEIN
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

4/5/17.
Date